	Case 2:10-cv-00014-GMN-PAL Document 22	20 Filed 01/28/13 Page 1 of 7	
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10	400 South Rampart Boulevard, Suite 400 Las Vegas, Nevada 89145		
11	Telephone: (702) 362-7800 Facsimile: (702) 362-9472		
12	Attorneys for Plaintiff		
13	ELAN MICROELECTRONICS CORPORATION		
14	UNITED STATES DISTRICT COURT		
15	DISTRICT OF NEVADA		
16			
17 18	ELAN MICROELECTRONICS CORPORATION,	Case No. 2:10-cv-00014-GMN-(PAL)	
19	Plaintiff,	ELAN MICROELECTRONICS CORPORATION'S MOTION TO FILE	
20	V.	UNDER SEAL	
21	PIXCIR MICROELECTRONICS CO. LTD.,		
22	Defendant.		
23			
24			
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27			
28			
	ELAN'S MOTION TO SEAL	Case No. 2:10-cv-00014 GMN-(PAL)	

1	Pursuant to Local Rule 10-5(b) and the Court's Protective Order dated September 22, 2011	
2	[Dkt. No. 40], plaintiff Elan Microelectronics Corporation ("Elan") hereby requests leave of Cour	
3	to file under seal the following documents, which will be filed contemporaneously herewith:	
4	1. Elan Microelectronics Corporation's Reply in Support of Elan's Motion to Compel	
5	Production of Communications and Work Product Improperly Withheld on the Basis of Privilege;	
6	and	
7	2. Exhibits A-D to the Supplemental Declaration of Sean P. DeBruine in Support of	
8	Elan Microelectronics Corporation's Motion to Compel Production of Communications and Work	
9	Product Improperly Withheld on the basis of Privilege.	
10	3. As grounds for this motion, Elan states that Elan's Motion contains information	
11	designated by Pixcir as "Confidential" or "Confidential – Attorney Eyes Only" pursuant to the	
12	Stipulated Protective Order in this matter.	
13	Pursuant to Local Rule 10-5(b), Elan will file the above-referenced paper under seal with	
14	the requisite notation: "FILED UNDER SEAL PURSUANT TO COURT ORDER DATED	
15	SEPTEMBER 22, 2011."	
16	DATED: January 23, 2013 Respectfully submitted,	
17		
18		
19	By: /s/ Sean P. DeBruine Robert J. Caldwell, Esq. (Nevada Bar No. 7637)	
20	Matthew J. Christian, Esq. (Nevada Bar No. 8024)	
21	KOLESAR & LEATHAM, CHTD. 400 South Rampart Boulevard, Suite 400	
22	Las Vegas, Nevada 89145	
23	and	
24	Sean P. DeBruine, Esq. Admitted <i>Pro Hac Vice</i>	
<ul><li>25</li><li>26</li></ul>	ALSTON & BIRD LLP 275 Middlefield Road, Suite 150 Menlo Park, California 94025	
27	Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATION	
28		
	Coso No. 2:10 ov 00014 GMN (DA	

1	CERTIFICATE OF SERVICE			
2 3	I hereby certify that I am an Employee of Alston & Bird LLP, and that on the 23rd day of			
4	January, 2013, I served a true and correct copy of foregoing <b>ELAN MICROELECTRONICS</b>			
	CORPORATION'S MOTION TO FILE UNDER SEAL in one or more of the following			
5	manners via:  (ELECTRONIC SERVICE) Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced			
6				
7	document was electronically filed and served upon the parties listed below through the Court's Case Management and Electronic Case Filing (CM/ECF) system:			
9				
110 111 112 113 114 115 116 117 118 119 220	Robert E. Krebs, Esq. Ronald F. Lopez, Esq. Christopher L. Ogden, Esq. Awaiting Pro Hac Vice Applications Nixon Peabody LLP 2 Palo Alto Square, 3000 El Camino Real, Suite 500 Palo Alto, California 94306-2106  Facsimile: (650) 320-7701  Email: rkrebs@nixonpeabody.com rflopez@nixonpeabody.com cogden@nixonpeabody.com  Attorneys for Defendant, Pixcir Microelectronics Corporation	Kenneth D'Alessandro, Esq. W. West Allen, Esq. Lewis and Roca, LLP 3993 Howard Hughes Parkway Suite 600 Las Vegas, Nevada 89169  Facsimile: (702) 949-8365  Email: kdalessandro@lrlaw.com wallen@lrlaw.com  Attorneys for Defendant, Pixcir Microelectronics Corporation		
21		/s/ Kate Smith		
22		Employee, Alston & Bird LLP		
23				
24				
25				
26				
27				
28				

3

CERTIFICATE OF SERVICE

Case No. 2:10-cv-00014 GMN-(PAL)

	Case 2:10-cv-00014-GMN-PAL Docum	ent 220	Filed 01/28/13	Page 4 of 7
1 2 3 4 5 6 7 8 9 10 11 12 13 14	SEAN P. DEBRUINE (admitted pro hac vices sean.debruine@alston.com JENNIFER (CELINE) LIU (admitted pro hac celine.liu@alston.com ALSTON & BIRD LLP 275 Middlefield Road, Suite 150 Menlo Park, California 94025 Telephone: 650-838-2000 Facsimile: 650-838-2001  ROBERT J. CALDWELL (Bar No. 007637) realdwell@klnevada.com MATTHEW J. CHRISTIAN (Bar No. 0080) mehristian@klnevada.com E. DANIEL KIDD (Bar No. 010106) dkidd@klnevada.com KOLESAR & LEATHAM, CHTD. 400 South Rampart Boulevard, Suite 400 Las Vegas, Nevada 89145 Telephone: (702) 362-7800 Facsimile: (702) 362-9472  Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORA	ac vice)  24)	TRICT COURT	
15	UNITED STATES DISTRICT COURT			
16	DISTRI	ICT OF	NEVADA	
17 18 19 20 21 22 23 24 25 26 27 28	ELAN MICROELECTRONICS CORPORATION,  Plaintiff,  v.  PIXCIR MICROELECTRONICS CO. LTD  Defendant.	[I E C	PROPOSED] OR LAN MICROEL	DER GRANTING ECTRONICS S MOTION TO FILE
	[PROPOSED] ORDER GRANTING ELAN'S MOTION TO SEAL		Ca	ase No. 2:10-cv-00014 GMN-(PAI

1	The Court has received plaintiff Elan Microelectronics Corporation's Motion to File Under
2	Seal, filed on January 23, 2013. Good cause appearing, Elan's motion is hereby GRANTED. It is
3	hereby ORDERED that the following documents may be filed under seal:
4	1. Elan Microelectronics Corporation's Reply in Support of Elan Microelectronics
5	Corporation's Motion to Compel Production of Communications and Work Product Improperly
6	Withheld on the Basis of Privilege; and
7	2. Exhibits A – D to the Supplemental Declaration Of Sean P. DeBruine In Support
8	Of Elan Microelectronics Corporation's Motion To Compel Production Of Communications And
9	Work Product Improperly Withheld On The Basis Of Privilege.
10	
11	IT IS SO ORDERED this 4: y day of Lepwet {, 2013.
12	
13	The Honorable Peggy A. Leen
14	United States Magistrate Judge
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<ul><li>27</li><li>28</li></ul>	
40	d

Respectfully submitted,
By: /s/ Sean P. DeBruine Robert J. Caldwell, Esq.
Nevada Bar No. 7637 <b>KOLESAR &amp; LEATHAM, CHTD.</b>
Matthew J. Christian, Esq. Nevada Bar No. 8024
400 South Rampart Boulevard, Suite 400 Las Vegas, Nevada 89145
and
Sean P. DeBruine, Esq.
Admitted <i>Pro Hac Vice</i> ALSTON & BIRD, LLP
275 Middlefield Road, Suite 150 Menlo Park, California 94025
Attorneys for Plaintiff
ELAN MICROELECTRONICS CORPORATION

- 2 -

Case No. 2:10-cv-00014 GMN-(PAL)

[PROPOSED] ORDER GRANTING ELAN'S MOTION TO SEAL

1	CERTIFICATE OF SERVICE		
2	I hereby certify that I am an Employee of Alston & Bird LLP, and that on the 23rd day of		
3	January, 2013, I served a true and correct copy of foregoing [PROPOSED] ORDER		
4	GRANTING ELAN MICROELECTRONICS CORPORATION'S MOTION TO FILE		
5	UNDER SEAL in one or more of the following	g manners:	
6	(ELECTRONIC SERVICE) Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced		
7	document was electronically filed and served upon the parties listed below through the Court's		
8	Case Management and Electronic Case Filing (CM/ECF) system:		
9			
10	Robert E. Krebs, Esq. Ronald F. Lopez, Esq.	Kenneth D'Alessandro, Esq. W. West Allen, Esq.	
11	Christopher L. Ogden, Esq.  Awaiting Pro Hac Vice Applications	Lewis and Roca, LLP 3993 Howard Hughes Parkway	
12	Nixon Peabody LLP 2 Palo Alto Square, 3000 El Camino Real,	Suite 600 Las Vegas, Nevada 89169	
13	Suite 500 Palo Alto, California 94306-2106	Facsimile: (702) 949-8365	
14	,	· ,	
	Facsimile: (650) 320-7701	Email: kdalessandro@lrlaw.com	
15	Email: rkrebs@nixonpeabody.com	wallen@lrlaw.com	
16	rflopez@nixonpeabody.com cogden@nixonpeabody.com	Attorneys for Defendant, Pixcir Microelectronics Corporation	
17	Attorneys for Defendant,		
18	Pixcir Microelectronics Corporation		
19			
20		/s/ Kate Smith	
21		Employee, Alston & Bird LLP	
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